

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
In the Matter of the Arbitration Between:	)	
	)	
PT SUMOHADIWIDJOJO,	)	
	)	
Applicant	)	
(Respondent below)	)	Civil Action No. 04 12646 NG
	)	
and	)	
	)	<b><u>STIPULATION</u></b>
BSB RESIDUAL ASSETS TRUST,	)	
BSB TRUST COMPANY, LTD., Trustee,	)	
	)	
Respondent	)	
(Claimant below).	)	
_____	)	

The parties hereby stipulate, through their undersigned counsel, that:

- a. Respondent shall have until June 16, 2005 to file an opposition to Applicant's Motion to Strike or Dismiss, or to Stay, Respondents' Purported "Counterclaim" in this matter.
- b. Applicant shall have until June 30, 2005 to file a reply brief, with leave of court if required, in support of Applicant's Motion to Strike or Dismiss, or to Stay, Respondents' Purported "Counterclaim" in this matter.
- d. Applicant's stipulation is without prejudice to its position that Respondent is not entitled to assert counterclaims or claims in setoff or recoupment in this matter, or its position that the Court lacks personal and subject matter jurisdiction over Applicant with respect to any such counterclaims or claims.
- e. Respondent's stipulation is without prejudice to its position that Respondent is entitled to assert counterclaims and claims in setoff and recoupment in this matter, or its position

that the Court has personal and subject matter jurisdiction over Applicant with respect to any such counterclaims or claims.

/s/ Richard S. Nicholson  
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Dated: May 27, 2005